

201 East Washington Street, Suite 1200
Phoenix, AZ 85004

LEWIS  **ROCA**

Nicole G. True, Bar No. 12879
NTrue@lewisroca.com
LEWIS ROCA ROTHGERBER CHRISTIE LLP
201 East Washington Street, Suite 1200
Phoenix, AZ 85004
Tel: 602.262.5311
Fax: 602.262.5747

Brian D. Blakley, Bar No. 13074
BBlakley@lewisroca.com
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Tel: 702.949.8200
Fax: 702.949.8398

Attorneys for Transamerica

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SARA FOLEY, in her capacity as
Administrator of the Estate of NOEL
MARTINEZ,

Plaintiff,

v.

WELLS FARGO BANK, N.A.;
TRANSAMERICA, et al.,

Defendants.

CASE NUMBER. 2:21-cv-01538-RFB-EJY

**STIPULATION FOR EXTENSION OF
TIME FOR TRANSAMERICA TO
RESPOND TO AMENDED COMPLAINT**

Plaintiff Sara Foley and Defendant Transamerica stipulate and agree that Transamerica may have an extension of time to file its response to the Amended Complaint. Transamerica requested and Plaintiff agreed to this extension so as to allow Transamerica's counsel to collect and review the documentation necessary to respond to the Amended Complaint. With the requested extension, Transamerica's response will be due December 15, 2021.

DATED this 29th day of November, 2021.

///

///

///

///

116114970.1

FORTRESS LAW AND REALTY

By: /s/
Keith Routsong
keith@fortresslawandrealty.com
10000 West Charleston Boulevard, Suite 130
Las Vegas, NV 89135

BLACKROCK LEGAL, LLC

By: /s/ Thomas R. Grover (with permission)
Michael A. Olsen
mike@blackrocklawyers.com
Thomas R. Grover
tom@blackrocklawyers.com
10155 West Twain Avenue, Suite 100
Las Vegas, NV 89147
Tel: 702.855.56.58
Fax: 702.869.8243
Attorneys for Plaintiff

LEWIS ROCA ROTHGERBER CHRISTIE
LLP

By: /s/ Nicole G. True
Nicole G. True, Bar No. 12879
NTrue@lewisroca.com
Brian D. Blakley, Bar No. 13074
BBlakley@lewisroca.com
201 East Washington Street, Suite 1200
Phoenix, AZ 85004
Tel.: 602.262.5311
Fax: 602.262.5747
Attorneys for Transamerica

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: November 29, 2021